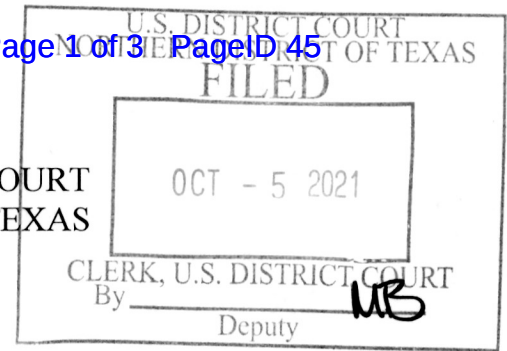


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION



UNITED STATES OF AMERICA

NO.

v.

FILED UNDER SEAL

DAVID BIAS (01)
RAYMOND GROSS (02)

3-21CR0500-B

INDICTMENT

The Grand Jury charges:

Count One

Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Violation of 21 U.S.C. § 846)

Beginning in or before January 2020, the exact date being unknown to the Grand Jury and continuing until in or around July 2020, in the Northern District of Texas and elsewhere, the defendants, **David Bias, Raymond Gross**, and others, did knowingly and intentionally combine, conspire, confederate, and agree with others both known and unknown to the Grand Jury to commit the following offense against the United States: to possess with the intent to distribute and to distribute a mixture and substance containing a detectable amount of promethazine with codeine, a Schedule V controlled substance, in violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846, the penalty for which is found at 21 U.S.C. § 841(b)(1)(E).

Forfeiture Notice
(21 U.S.C. § 853(a))

Upon conviction for the offense alleged in Count One of this Indictment and pursuant to 21 U.S.C. § 853(a), the defendants, **David Bias** and **Raymond Gross**, shall forfeit to the United States of America all property, real or personal, constituting, or derived from, the proceeds obtained, directly or indirectly, as the result of the offense and any property, real or personal, used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

A TRUE BILL:



FOREPERSON

CHAD E. MEACHAM
ACTING UNITED STATES ATTORNEY



LINDSEY BERAN
Assistant United States Attorney
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THE UNITED STATES OF AMERICA

v.

DAVID BIAS (01)
RAYMOND GROSS (02)

SEALED INDICTMENT

21 U.S.C. § 846
Conspiracy to Possess with Intent to Distribute a Controlled Substance
(Count 1)

21 U.S.C. § 853(a)
Forfeiture Notice

1 Counts

A true bill rendered

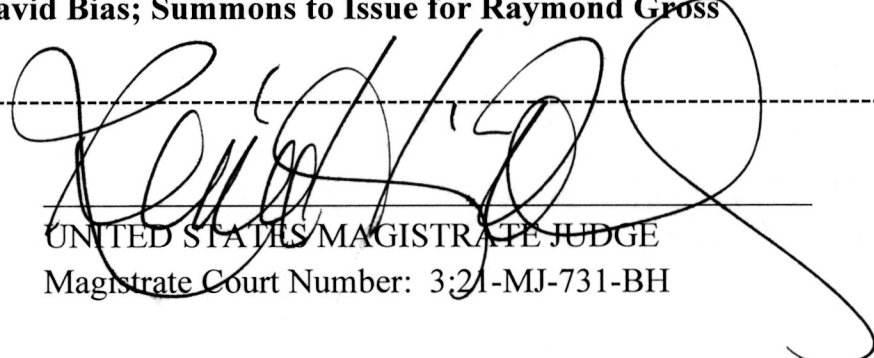
DALLAS



FOREPERSON

Filed in open court this 5th day of October, 2021.

Warrant to issue for David Bias; Summons to Issue for Raymond Gross



UNITED STATES MAGISTRATE JUDGE
Magistrate Court Number: 3:21-MJ-731-BH